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Attorneys for the Debtors

Special Litigation Counsel for Regal Property Holdings, Inc., Richard Neill Trevor Roberts, and Jane Sheridan Roberts

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:
 REGAL PROPERTY HOLDINGS, INC.,
 Debtor.

Case No.: 13-13969-BTB
 Chapter 11
 Lead Case

In re:
 RICHARD NEILL TREVOR ROBERTS and
 JANE SHERIDAN ROBERTS,
 Debtors.

Case No. 13-13968-BTB
 Chapter 11
 Joint Administration With: 13-13969-BTB

STIRLING MORTIMER GLOBAL
 PROPERTY FUND PCC LIMITED,

Adversary Proceeding No.: 13-01147-BTB

Plaintiff,

**DECLARATION OF RICHARD NEILL
 TREVOR ROBERTS IN SUPPORT OF
 MOTION FOR APPROVAL OF
 SETTLEMENT AGREEMENT**

v.

RICHARD NEILL TREVOR ROBERTS
 and JANE SHERIDAN ROBERTS,

Hearing Date: *OST Requested*
 Hearing Time: *OST Requested*
 Courtroom: 4

Defendants.

I, Richard Neill Trevor Roberts, hereby state as follows under penalty of perjury:

1. I am over the age of 18 and mentally competent.

2. I make this declaration in support of the *Motion for Approval of Settlement* (the “**Motion**”) filed by Regal Property Holdings, Inc., Richard Neill Trevor Roberts, and Jane Sheridan Roberts, (the “**Debtors**”) in the above-captioned bankruptcy cases.

3. I make this declaration in my individual capacity and as the President of Regal Property Holdings, Inc.

4. I have personal knowledge of the facts stated herein, and, if called upon to testify, I could and would do so.

5. I have reviewed the Motion and factual assertions made therein, and, as to those of which I have personal knowledge, I affirm the truthfulness and accuracy of such factual assertions.

6. Prior to the filing of the Debtors’ respective bankruptcy cases (the “**Bankruptcy Cases**”), DLA Piper UK (“**DLA**”) had acted on behalf of the Debtors for purposes of the action brought in England (the “**English Action**”) by Stirling Mortimer Global Property Fund PCC Limited (“**Stirling**” and, with the Debtors, the “**Parties**”).

7. Soon after filing the Bankruptcy Cases, it became clear the Debtors and their respective bankruptcy estates (the “**Estates**”) could not afford to retain DLA to defend English Action.

8. Furthermore, as the Court is aware, Ms. Roberts and I each have serious health issues that make travel to England or the participation in the English Action impossible.

9. Thus, I and the other Debtors determined Lionel Sawyer & Collins (“**LSC**”) would serve as lead counsel for all issues related to the various actions brought by Stirling.

10. Thereafter, I and the other Debtors informed DLA that they would not be retained by the Debtors or the Estates on a going forward basis., and that LSC would serve as the primary contact for MW with respect to any of Stirling’s proceedings against the Debtors.

11. In mid-September of 2013, I directed LSC to contact English counsel for Stirling, Maitland Walker LLP (“**MW**”), in an attempt to reach a global resolution of all issues existing

1 between the Parties. Settlement discussions began in earnest in mid-September of 2013, and
2 detailed negotiations continued thereafter, with the Parties reaching an agreement in principle in
3 mid-November of 2013.

4 12. I am familiar with and understand the terms of the settlement between the Parties
5 (the "**Settlement**"), as such is detailed in the settlement agreement (the "**Agreement**").

6 13. As detailed in the Motion, given the uncertain outcome of the litigation between
7 the Parties and the costs of such litigation, I believe the Settlement, as detailed in the Agreement,
8 is fair and equitable and is in the best interests of the Estates and of all parties in interest.

9 14. I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
10 TRUE AND CORRECT.

11 Executed on this 17 th day of December, 2013.


Richard Neill Trevor Roberts